

# Exhibit B



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

Sanjay Ghosh  
T 404-322-6282 F 404-322-6050  
sanjay.ghosh@nelsonmullins.com

Atlantic Station/201 17<sup>th</sup> St., NW/Suite 1700  
Atlanta GA 30363  
T 404-322-6000 F 404-322-6397  
nelsonmullins.com

March 23, 2018

VIA EMAIL AND U.S. MAIL

Mark S. O'Connor  
Paul Stoller  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road, Suite 1100  
Phoenix, Arizona 85016  
[paul.stoller@gknet.com](mailto:paul.stoller@gknet.com)  
[mark.oconnor@gknet.com](mailto:mark.oconnor@gknet.com)

William B. Curtis  
Curtis Law Group  
12225 Greenville Ave., Ste 750  
Dallas TX 75243  
[bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)

Ramon Lopez  
Matthew Lopez  
Lopez McHugh, LLP  
100 Bayview Circle, Suite 5600  
Newport Beach, CA 92660  
[rlopez@lopezmchugh.com](mailto:rlopez@lopezmchugh.com)  
[mlopez@lopezmchugh.com](mailto:mlopez@lopezmchugh.com)

***Re: Various Plaintiffs v. C. R. Bard, Inc., et al., Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)  
Various Plaintiffs' Profile Forms***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") due dates are referenced in the following chart; however, we still have not received the PPF for your client.

PLAINTIFF NAME	PPF DUE DATE
Brown, Lynn	3/4/2018
Chuculate, Eric	3/4/2018
Duffala, Dale	3/4/2018
Romero, Jaime	3/4/2018

Gallagher & Kennedy, P.A.  
Lopez McHugh, LLP  
Curtis Law Group  
March 23, 2018  
Page 2

Please send the PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,



Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

Sanjay Ghosh  
T 404-322-6282 F 404-322-6050  
[sanjay.ghosh@nelsonmullins.com](mailto:sanjay.ghosh@nelsonmullins.com)

Atlantic Station/201 17<sup>th</sup> St., NW/Suite 1700  
Atlanta GA 30363  
T 404-322-6000 F 404-322-6397  
[nelsonmullins.com](http://nelsonmullins.com)

August 14, 2018

**VIA EMAIL AND U.S. MAIL**

Mark S. O'Connor  
Paul Stoller  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road, Suite 1100  
Phoenix, Arizona 85016  
[paul.stoller@gknet.com](mailto:paul.stoller@gknet.com)  
[mark.oconnor@gknet.com](mailto:mark.oconnor@gknet.com)

William B. Curtis  
Curtis Law Group  
12225 Greenville Ave., Suite 750  
Dallas TX 75243  
[bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)

Ramon Lopez  
Matthew Lopez  
Lopez McHugh, LLP  
100 Bayview Circle, Suite 5600  
Newport Beach, CA 92660  
[rlopez@lopezmchugh.com](mailto:rlopez@lopezmchugh.com)  
[mlopez@lopezmchugh.com](mailto:mlopez@lopezmchugh.com)

***Re: Brown, Lynn v. C. R. Bard, Inc., et al., Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)  
Plaintiff's Profile Form for Lynn Brown***

Dear Counsel,

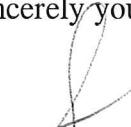
This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") was due no later than March 4, 2018; however, we still have not received a PPF for your client.

This is the second overdue letter we are sending since we have not received a response to the first one. Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the

Gallagher & Kennedy, P.A.  
Lopez McHugh, LLP  
Curtis Law Group  
August 14, 2018  
Page 2

Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,



Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/



NELSON MULLINS RILEY & SCARBOROUGH LLP  
ATTORNEYS AND COUNSELORS AT LAW

Sanjay Ghosh  
T 404-322-6282 F 404-322-6050  
sanjay.ghosh@nelsonmullins.com

Atlantic Station/201 17<sup>th</sup> St., NW/Suite 1700  
Atlanta GA 30363  
T 404-322-6000 F 404-322-6397  
nelsonmullins.com

November 8, 2018

**VIA EMAIL AND U.S. MAIL**

Mark S. O'Connor  
Paul Stoller  
Gallagher & Kennedy, P.A.  
2575 East Camelback Road, Suite 1100  
Phoenix, Arizona 85016  
[paul.stoller@gknet.com](mailto:paul.stoller@gknet.com)  
[mark.oconnor@gknet.com](mailto:mark.oconnor@gknet.com)

William B. Curtis  
Curtis Law Group  
12225 Greenville Ave., Suite 750  
Dallas TX 75243  
[bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)

Ramon Lopez  
Matthew Lopez  
Lopez McHugh, LLP  
100 Bayview Circle, Suite 5600  
Newport Beach, CA 92660  
[rlopez@lopezmchugh.com](mailto:rlopez@lopezmchugh.com)  
[mlopez@lopezmchugh.com](mailto:mlopez@lopezmchugh.com)

***Re: Various Plaintiffs v. C. R. Bard, Inc., et al., Civil Action Number: No. MDL-15-02641-PHX-DGC (United States District Court for the District of Arizona)  
Plaintiff's Profile Form for Various Plaintiffs***

Dear Counsel,

This firm represents C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. in the above-referenced civil action. Your client's Plaintiff Profile Form ("PPF") due dates are referenced in the following chart; however, we still have not received the PPF for your client.

Gallagher & Kennedy, P.A.

Lopez McHugh, LLP

Curtis Law Group

November 8, 2018

Page 2

PLAINTIFF NAME	PPF DUE DATE
Lynn Brown	3/4/2018
Cargin Madison, III	4/10/2018
Elizabeth Harpster	6/7/2018

This is the third overdue letter we are sending since we have not received a response to the others. Please send a PPF with the missing information at your earliest convenience, but no later than 20 days from the date of this letter. The defendants will move to dismiss the Complaint if a PPF is not received within the requisite time period specified by the Court. *See* Case Management Order, No. 5 [Doc. 365], p. 2.

Sincerely yours,



Sanjay Ghosh

*Attorney for C.R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.*

SG/